

APPENDIX A

APPENDIX A – PLAINTIFF’S WITNESS LIST**PLAINTIFF FINJAN, INC.’S LIST OF FACT AND EXPERT WITNESSES**

United States District Court
For the Northern District of California (San Jose Division)

Finjan, Inc. v. Blue Coat Systems, Inc.

Case No. 15-cv-03295-BLF

Trial Date: October 30, 2017

Plaintiff Finjan, Inc. (“Finjan”) identifies the following witnesses whom it may call live or by deposition at trial. This list is not a commitment that Finjan will call any particular witness at trial, or a representation that any of the witnesses listed are available or will appear for trial. If any third-party witness is unavailable, Finjan reserves the right to use his or her deposition testimony. With respect to Blue Coat’s witnesses, Finjan reserves the right to introduce testimony through deposition or live examination, as appropriate. Finjan also reserves the right to call any witnesses listed or called by Blue Coat, and to revise this list in light of further rulings by the Court, including any rulings regarding the amount of time allotted for the parties to present their case at trial, or any other changed circumstances.

I. FACT AND EXPERT WITNESSES**A. Witnesses That Will Be Called in Connection with Finjan:**

Witness	Subject Matter	Estimate of length of testimony	Expert Testimony	Expert CV and Report Citation¹
Dr. Harry Bims (expert)	Technology Tutorial	1 hour [Live]	Theory: Technology involved in this case Bases: Knowledge and experience in field, review of documents; materials identified within expert report dated March 29, 2017.	

¹ Copies of Finjan’s Expert Reports are concurrently being lodged with the Court.

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Witness	Subject Matter	Estimate of length of testimony	Expert Testimony	Expert CV and Report Citation¹
Dr. Eric Cole (expert)	Blue Coat’s infringement of U.S. Patent Nos. 6,154,844 and 8,677,494	5 hours [Live]	<p>Theory: Blue Coat’s infringement of Finjan’s patents</p> <p>Bases: knowledge and experience in field, testing of accused products, review of Finjan and Blue Coat documents, source code, deposition testimony, public documents, pleadings; materials identified within expert report dated March 29, 2017</p>	
Dr. Michael Goodrich (expert)	Validity of U.S. Patent Nos. 8,225,408; 8,677,494; 9,189,621; and 9,219,755	4 hours [Live]	<p>Theory: rebuttal to Blue Coat’s expert’s invalidity theories</p> <p>Bases: knowledge and experience in field, review of prior art, deposition testimony, Finjan and Blue Coat documents, public documents, pleadings; materials identified within expert report dated April 21, 2017.</p>	
Philip Hartstein, President of Finjan	Finjan’s business and licensing of its patents	1 hour [Live]		

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Witness	Subject Matter	Estimate of length of testimony	Expert Testimony	Expert CV and Report Citation¹
Dr. David Lyon (expert)	Validity of U.S. Patent Nos. 6,965,968, 7,418,731, and 8,079,086	4 hours [Live]	<p>Theory: rebuttal to Blue Coat’s expert’s invalidity theories</p> <p>Bases: knowledge and experience in field, review of prior art, deposition testimony, Finjan and Blue Coat documents, public documents, pleadings; materials identified within expert report dated April 21, 2017.</p>	
Dr. Nenad Medvidovic (expert)	Advantages of technology of U.S. Patent Nos. 6,154,844; 7,418,731; 6,965,968; 7,418,731; 8,079,086; 8,225,408; 8,677,494; 9,189,621; 9,219,755; and Infringement of U.S. Patent Nos. 8,079,086; 9,189,621; 9,219,755	4 hours [Live]	<p>Theory: advantages of patented technology and Blue Coat’s infringement of Finjan’s patents.</p> <p>Bases: knowledge and experience in field, testing of accused products, review of Finjan and Blue Coat documents, source code, deposition testimony, public documents, pleadings; materials identified within expert report dated March 29, 2017.</p>	

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Witness	Subject Matter	Estimate of length of testimony	Expert Testimony	Expert CV and Report Citation¹
Dr. Christine Meyer (expert)	Damages owed to Finjan	3 hours [Live]	<p>Theory: damages owed by Blue Coat to Finjan for patent infringement</p> <p>Bases: knowledge and experience in field, review of Finjan and Blue Coat documents, deposition testimony, public documents, pleadings; peer-reviewed articles and books; materials identified within expert report dated March 29, 2017 and supplemental report dated April 7, 2017.</p>	
Dr. Michael Mitzenmacher (expert)	Blue Coat’s infringement of U.S. Patent Nos. 6,965,968; 7,418,731; and 8,225,408	5 hours [Live]	<p>Theory: Blue Coat’s infringement of Finjan’s patents</p> <p>Bases: knowledge and experience in field, testing of accused products, review of Finjan and Blue Coat documents, source code, deposition testimony, public documents, pleadings; materials identified within expert report dated March 29, 2017.</p>	

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Witness	Subject Matter	Estimate of length of testimony
John Ahlander, Vice President of Product Development	Blue Coat’s accused products/services	5 to 20 minutes [by deposition]
Bjorn Andersen, Senior Developer	Blue Coat’s accused products/services	5 to 20 minutes [by deposition]
Tyler Anderson, Program Manager and Architect for Global Intelligence Network	Blue Coat’s accused products/services	5 to 20 minutes [by deposition]
Yuval Ben-Itzhak, former CTO and Finjan consultant	The Finjan Vital Security appliances	1 hour [Live]
Christophe Birkeland, General Manager for Blue Coat (Norway) AS	Blue Coat’s accused products/services	5 to 20 minutes [by deposition]
Timothy Chiu, Manager of Product Marketing	Blue Coat’s accused products/services	5 to 20 minutes [by deposition]
Tom Clare, former Senior Director of Product Marketing	Blue Coat’s accused products/services	5 to 20 minutes [by deposition]
Jim Dildine, Chief Accounting Officer and Senior Vice President of Finance	Blue Coat’s accused products/services, sales and financial information	5 to 20 minutes [by deposition]
Karl Ford, Senior Director of Engineering	Blue Coat’s accused products/services	5 to 20 minutes [by deposition]
John Garland, Director of Business Development	Finjan’s licensing practices	1 hour [Live]
Roger Harrison, Senior Director of Engineering	Blue Coat’s accused products/services	5 to 20 minutes [by deposition]

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Witness	Subject Matter	Estimate of length of testimony
Dr. Trent Jaeger (expert)	Validity of ‘844 Patent	1 hour [Live]
David R. Kroll Inventor of the ‘086 and ‘494 Patents	Conception, development and reduction to practice of the ‘086 and ‘494 Patents	1 hour [Live]
Philip Langer, Worldwide Vice President of Service Sales	Blue Coat’s accused products/services	5 to 20 minutes [by deposition]
Chris Larsen, Malware Research Team Leader/Architect on Threat Research Team	Blue Coat’s accused products/services	5 to 20 minutes [by deposition]
Tim Larsen, Principal Software Engineer	Blue Coat’s accused products/services	5 to 20 minutes [by deposition]
Mark Maxted, Senior Software Engineer and Principal Architect	Blue Coat’s accused products/services	5 to 20 minutes [by deposition]
Raymond Miller, Director of Engineering	Blue Coat’s accused products/services	5 to 20 minutes [by deposition]
Luis Nova, Senior Software Engineer	Blue Coat’s accused products/services	5 to 20 minutes [by deposition]
Kevin Rohan, Principal Software Engineer	Blue Coat’s accused products/services	5 to 20 minutes [by deposition]
Patrik Runald, Vice President of Product Development	Blue Coat’s accused products/services	5 to 20 minutes [by deposition]
Steven Schoenfeld, Senior Vice President of Product Management	Blue Coat’s accused products/services	5 to 20 minutes [by deposition]
Zachary Sivertson, Director of Product Management	Blue Coat’s accused products/services	5 to 20 minutes [by deposition]

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Witness	Subject Matter	Estimate of length of testimony
Djordje Sorgic, ASG Architect and Software Developer	Blue Coat’s accused products/services	5 to 20 minutes [by deposition]
Gary Tomic, System Software Architect	Blue Coat’s accused products/services	5 to 20 minutes [by deposition]
Shlomo Touboul Inventor of the ‘494, ‘844, ‘968, ‘731, ‘086, ‘408, ‘786, ‘621, and ‘755 Patents	Conception, development, and reduction to practice of the Patents-in-Suit; Finjan’s business	10 minutes [by deposition]
Matt Wood, Chief Scientist, Advanced Threat Protection Group	Blue Coat’s accused products/services	5 to 20 minutes [by deposition]